

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

CRIMINAL NO. 18-10176-LTS

JASON COBB

DEFENDANT'S MOTION IN LIMINE TO PROHIBIT
REFERENCE TO STATUS REQUIRED AS THAT OF A "FELON"

Defendant Jason Cobb respectfully moves that this Court and the government refer to the prior conviction that is an element of 18 U.S.C. § 922(g)(1) as one "punishable by imprisonment for more than one year," rather than as a "felony conviction," and further moves that the word "felon" not be used in describing the charge against Mr. Cobb or describing him.

As ground for this motion, defendant submits that the word "felon" may have pejorative connotations to the jury beyond the simple statutory requirement.

JASON COBB

By his attorney,

/s/ Miriam Conrad

Miriam Conrad

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CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the ECF system, will be sent electronically to the registered Participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as nonregistered participants on November 26, 2018.

/s/ Miriam Conrad